

FREEMAN, NOOTER & GINSBERG  
ATTORNEYS AT LAW

LOUIS M. FREEMAN  
THOMAS H. NOOTER\*  
LEE A. GINSBERG

75 MAIDEN LANE  
SUITE 907  
NEW YORK, N.Y. 10038

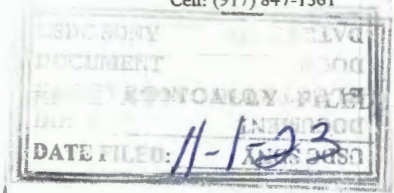
(212) 608-0808  
Cell: (917) 847-1361

MEMO ENDORSED

\*NY AND CALIF. BARS

October 24, 2023

Honorable Lewis A. Kaplan  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007



Consent Letter Motion

RE: United States v. Shayn Marshall, 23 Cr. 359 (LAK)

Your Honor:

I was recently appointed by the Court to replace the Federal Defender Office in representing Shayn Marshall, the defendant in this case. At that time a motion schedule was already in place requiring that defense motions be filed on or by October 26, 2023, with government response due two weeks later, defendant's reply due November 15, 2023, and for a conference for argument to be held on November 16, 2023.

I find that because of the volume of discovery and the difficulties in meeting with my client (who is housed at Essex County Correctional Facility in Newark, New Jersey), that I need more time to prepare the only motion I am considering making, which would be a motion to suppress. I will note that we are also in discussions concerning a possible disposition of the case.

I have conferred with the prosecutor in this case, AUSA Henry Ross, and we respectfully propose the following revised schedule for motions: defense motions due on **November 13, 2023**, government response due **November 27, 2023**, defense reply, **December 4, 2023**, and a conference any day thereafter which is convenient for the Court.

I will note that we are working around the fact that both of us have some travel plans for the Thanksgiving holiday week.

On behalf of my client I consent to waive speedy trial time until the new conference date to be set by the Court.

*Granted. True  
checked to and concluding  
12/4/23*

*11/1/23*